



Elise S. Feldman
efeldman@rothmanrocco.com

April 9, 2025

FILED VIA ECF

Hon. Kenneth M. Karas, U.S.D.J.
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

**Re: Gomez, et al. v. Edison Lithograph and Printing Corp.
Civil Action No. 24-CV-00193 (KMK)**

Dear Judge Karas:

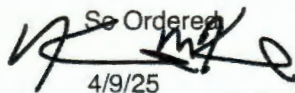
This firm represents the Plaintiffs in the above-referenced complaint to collect unpaid benefit fund contributions, plus interest, damages, fees, and costs from Defendant Edison Lithograph and Printing Corp. ("Edison" or "Defendant"). Plaintiffs intend to file supplemental documentation to support their request for damages. This filing has been delayed due to various issues, including document investigation and personal family medical matters. However, the supplemental submission is underway.

Unfortunately, due to the upcoming holiday, the undersigned must respectfully request that the default judgment documents currently due to be served on Defendant by April 18, 2025, be rescheduled for submission on April 30, 2025 to allow Plaintiffs time to complete the supplemental damages submission. This would also affect the opposition, currently due on April 25, 2025, which the undersigned requests be rescheduled for May 7, 2025. The undersigned requests that Plaintiffs' reply, if any, currently due on May 5, 2025, be rescheduled for May 14, 2025. Finally, Plaintiff requests that the telephone conference, currently set for May 6, 2025, be rescheduled for May 20, 2025.

The instant matter is in default, and therefore, the undersigned does not have consent or refusal from counsel for Defendant. This is Plaintiffs' first request for an extension of time to file their fees application. Thank you for your consideration of our request.

Granted, but there will be no more extensions.

Respectfully submitted,
/s/ Elise S. Feldman
Elise S. Feldman

Se Orderen

4/9/25

cc:

Edison Lithograph and Printing Corp. (via overnight and first-class mail)
3725 Tonnelle Avenue
North Bergen, NJ 07047